

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
)	
INEPAR DECISIONLINK CORP.)	File No. ITC-214-2001-_____
)	
Application for Global Authority Pursuant to)	
Section 214 of the Communications Act)	
of 1934, as amended, to Operate as an)	
International Facilities-Based and Resale Carrier)	
Between the United States and Various)	
International Points)	
)	

APPLICATION

Inepar DecisionLink Corp. ("IDL" or "Applicant"), by its undersigned counsel, hereby requests global facilities-based authority and global resale authority, under Section 214 of the Communications Act of 1934, as amended (the "Act"), 47 U.S.C. § 214, and Section 63.18 of the Commission's Rules, 47 C.F.R. § 63.18, to provide international telecommunications services between the United States and international points. This application qualifies for streamlined processing.

I. THE APPLICANT

Inepar DecisionLink Corp., ("IDL") is a limited liability company organized under the laws of the State of Delaware. IDL is affiliated, within the meaning of Section 63.09(e) of the Commission's Rules, 47 C.F.R. §63.09(e), with Inepar Telecomunicacoes S.A., ("Inepar"), a non-dominant foreign carrier in Brazil, a destination country to which it intends to provide services. Inepar is not dominant on any route between a destination country and the U.S., nor does it appear on the Commission's list of carriers presumptively deemed to have market power

pursuant to Section 63.10(a)(3) of the Commission's Rules, 47 C.F.R. §63.10(a)(3). Brazil, Inepar's home country, is a WTO member country. Therefore, IDL qualifies for a presumption of non-dominance under Section 63.10(a)(1) of the Commission's Rules, 47 C.F.R. § 63.10(a)(3), and its application is eligible for streamlined processing pursuant to Section 63.12 of the Commission's Rules, 47 C.F.R. § 63.12.

II. PUBLIC INTEREST CONSIDERATIONS

Applicant believes that the added competition its entry will bring to the market will benefit consumers of United States-overseas services. These benefits include competitive pricing and increased availability of a variety of service options. Therefore, a grant of this Application will further the public interest.

III. INFORMATION REQUIRED BY SECTION 63.18

Applicant submits the following information, as required by Section 63.18 of the Commission's Rules, in support of its request for Section 214 authorization:

- (a) Name, address and telephone number of Applicant:

Inepar DecisionLink Corp.
3033 Kellway Drive, Suite 118
Carrollton, Texas 75006
Telephone: (972) 416-8086
Facsimile: (972) 418-8075

- (b) Applicant is organized under the laws of the State of Delaware.

- (c) Correspondence concerning this application should be sent to:

Helen E. Disenhaus
Harry N. Malone
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
Tel: (202) 424-7500
Fax: (202) 424-7645

with a copy to:

Chief Executive Officer
Inepar DecisionLink Corp.
3033 Kellway Drive, Suite 118
Carrollton, Texas 75006
Telephone: (972) 416-8086 x250
Facsimile: (972) 418-8075

- (d) Applicant has not previously received authority under Section 214 of Act. Upon grant of this Application, IDL will become an authorized non-dominant facilities-based carrier and reseller with global authority, pursuant to Section 214 of the Act and the Commission's Rules.
- (e)
 - (1) Applicant requests Section 214 authority to operate as a facilities-based carrier pursuant to Section 63.18(e)(1) of the Commission's Rules. Applicant requests such authorization for all international routes authorized by the Commission. Applicant certifies that it will comply with the terms and conditions of Sections 63.21 and 63.22 of the Commission's Rules.
 - (2) Applicant also requests Section 214 authority to resell the international services of authorized U.S. common carriers pursuant to Section 63.18(e)(2) of the Commission's Rules. Applicant requests such authorization for all international routes authorized by the Commission. Applicant certifies that it will comply with the terms and conditions contained in Section 63.21 and 63.23 of the Commission's Rules.
- (f) Applicant seeks authority to provide only the services referenced under paragraph (e) of Section 63.18 of the Commission's Rules.
- (g) Because Applicant is not seeking facilities-based authority pursuant to Section 63.18(e)(4) of the Commission's Rules, this Section is not applicable.
- (h) The following entities hold a ten percent (10%) or greater ownership or management interest in Inepar DecisionLink Corp.:

Name: DecisionLink, Inc.
Address: 1181 Grier Drive, Suite B
Las Vegas, Nevada 89119
Percentage Held: 51%
Citizenship: USA
Principal Business: Remote asset monitoring systems

Name: Inepar Telecommunicacoes S.A.
Address: Joao Gualberto 570 Avenue
Alto da Gloria district
Curitiba-PR
Brazil CEP 80030-000
Percentage Held: 49%
Citizenship: Brazil
Principal Business: Telecommunications

The following entities hold a ten percent or greater ownership or management interest in IDL through their specified ownership in DecisionLink, Inc.:

Name: Peter J. Lagergren
Address: c/o Inepar DecisionLink Corp.
3033 Kellway Drive, Suite 118
Carrollton, Texas 75006
Percentage Held: 19%
Citizenship: USA
Principal Business: Remote asset monitoring systems

Name: David S. Peachey
Address: c/o Inepar DecisionLink Corp.
3033 Kellway Drive, Suite 118
Carrollton, Texas 75006
Percentage Held: 18%
Citizenship: USA
Principal Business: Remote asset monitoring systems

The following entities hold a ten percent or greater ownership or management interest in IDL through their specified ownership in Inepar Telecomunicacoes S.A.:

Name:	Inepar S/A Indústria Construções
Address	Joao Gualberto 570 Avenue Alto da Gloria district Curitiba-PR Brazil CEP 80030-000
Percentage Held:	89%
Citizenship:	Brazil
Principal Business:	Telecommunications

The following entities hold a ten percent or greater ownership or management interest in IDL through their specified ownership in Inepar S/A Indústria Construções:

Name:	Inepar Administration and Participation
Address:	Joao Gualberto 570 Avenue Alto da Gloria district Curitiba-PR Brazil CEP 80030-000
Percentage Held:	60%
Citizenship:	Brazil
Principal Business:	Telecommunications

The following entities hold a ten percent or greater ownership or management interest in IDL through their specified ownership in Inepar Administration and Participation:

Name:	Juaneval de Oms
Address:	c/o Inepar Administration and Participation Joao Gualberto 570 Avenue Alto da Gloria district Curitiba-PR Brazil CEP 80030-000
Percentage Held:	21%
Citizenship:	Brazil
Principal Business:	Telecommunications

Name: Mario Celso Petraglia
Address: c/o Inepar Administration and Participation
Joao Gualberto 570 Avenue
Alto da Gloria district
Curitiba-PR
Brazil CEP 80030-000
Percentage Held: 21%
Citizenship: Brazil
Principal Business: Telecommunications

Name: Atilano de Oms Sobrinho
Address: c/o Inepar Administration and Participation
Joao Gualberto 570 Avenue
Alto da Gloria district
Curitiba-PR
Brazil CEP 80030-000
Percentage Held: 21%
Citizenship: Brazil
Principal Business: Telecommunications

Name: INSA Administração e Serviços Ltda
Address: Joao Gualberto 570 Avenue
Alto da Gloria district
Curitiba-PR
Brazil CEP 80030-000
Percentage Held: 21%
Citizenship: Brazil
Principal Business: Telecommunications

The following entities hold a ten percent or greater ownership or management interest in IDL through their specified ownership in INSA Administração e Serviços Ltda:

Name: Juaneval de Oms
Address: c/o Inepar Administration and Participation
Joao Gualberto 570 Avenue
Alto da Gloria district
Curitiba-PR
Brazil CEP 80030-000
Percentage Held: 33%
Citizenship: Brazil
Principal Business: Telecommunications

Name: Mario Celso Petraglia
Address: c/o Inepar Administration and Participation
Joao Gualberto 570 Avenue
Alto da Gloria district
Curitiba-PR
Brazil CEP 80030-000
Percentage Held: 33%
Citizenship: Brazil
Principal Business: Telecommunications

Name: Atilano de Oms Sobrinho
Address: c/o Inepar Administration and Participation
Joao Gualberto 570 Avenue
Alto da Gloria district
Curitiba-PR
Brazil CEP 80030-000
Percentage Held: 34%
Citizenship: Brazil
Principal Business: Telecommunications

In summary, using the attribution rules in Note 4 of paragraph (h) of section 63.18, the following entities described above ultimately hold interests in IDL of greater than 10%:

Peter J. Lagergren	19%
David S. Peachey	18%
Juaneval de Oms	15%
Mario Celso Petraglia	15%
Atilano de Oms Sobrinho	15%

Inepar DecisionLink Corp. has interlocking directorates with a foreign carrier, Inepar, one of its parent companies. Two of Inepar's directors, Helcio Gaertner and Ricardo Woitowicz, are also directors of IDL.

- (i) IDL certifies that it is not itself a foreign carrier, but it is affiliated with a foreign carrier, Inepar Telecomunicacoes, S.A. of Brazil, which provides mobile satellite services in Brazil through the Iridium Satellite network, of which it is a principal. Inepar is authorized to provide telecommunications services in Brazil, but it is not a dominant provider of telecommunications services in a relevant market in Brazil or any other destination country.
- (j) The Applicant seeks to provide international telecommunications services to all global points, except those points on the Commission's Exclusion List. This includes Brazil, a country in which it has an affiliation with a non-dominant foreign carrier as described in Section 63.18(j) of the Commission's Rules, 47

C.F.R. § 63.18(j). Section (i) of this Application identifies IDL's non-dominant foreign affiliate.

- (k) Brazil is a member of the World Trade Organization.
- (l) The Applicant should be classified as non-dominant pursuant to Section 63.10(a)(3) of the Commission's Rules, 47 C.F.R. §63.10(a)(3). The Applicant's foreign carrier affiliates will be offering services in competition with dominant foreign carriers and others. They will hold significantly less than 50% market shares in the international transport and local access markets in the countries in which they are operating. Moreover, the Applicant's affiliates will not and do not have the ability to exercise market control or to discriminate against unaffiliated United States international carriers through the control of bottleneck services or facilities in the countries in which they operate. Accordingly, the Applicant's foreign carrier affiliates will not possess sufficient market power on the applicable U.S. international routes to affect competition adversely in the United States telecommunications market. The Applicant and its foreign carrier affiliates should be presumptively classified as non-dominant carriers on all international routes.
- (m) As described in Paragraph (l) above, the Applicant presumptively qualifies for non-dominant treatment for the provision of all international telecommunications services pursuant to Section 63.10 of the Commission's Rules, 47 C.F.R. §63.10.
- (n) The Applicant certifies that it has not agreed, and will not agree in the future, to accept special concessions, as defined in Section 63.14(b) of the Commission's Rules, directly or indirectly from any foreign carrier where the foreign carrier possesses market power on the foreign end of the route and will not enter into such agreements in the future.
- (o) IDL certifies, pursuant to Sections 1.2001 through 1.2003 of the Commission's Rules (implementing the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 3301), that no party to its application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.
- (p) Applicant qualifies for streamlined processing pursuant to Section 63.12 of the Commission's Rules, 47 C.F.R. § 63.12, because Sections 63.12(c)(1)-(4) do not apply to Applicant.

IV. CONCLUSION

For the reasons stated above, Inepar DecisionLink Corp. respectfully submits that the public interest, convenience, and necessity would be furthered by a grant of this Section 214 Application.

Respectfully submitted,

Helen E. Disenhaus
Harry N. Malone
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, DC 20007
Tel: (202) 424-7500
Fax: (202) 424-7645

Counsel for Inepar DecisionLink Corp.

Dated: August 8, 2001

CERTIFICATION OF APPLICANT

On behalf of Inepar DecisionLink Corp., I hereby certify that the statements in the foregoing Application for Section 214 authority are true, complete, and correct to the best of my knowledge and are made in good faith.

By: _____

Name: Peter J. Lagergren

Title: Director of Inepar DecisionLink Corp.

Date: _____